

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ASSOCIATION OF AMERICAN UNIVERSITIES,
et al.

Plaintiffs,

V.

Case No. 1:25-cv-10912-ADB

DEPARTMENT OF ENERGY, *et al.*,

Defendants.

JOINT MOTION TO STAY ALL DEADLINES

Pursuant to Federal Rules of Civil Procedure 6(b)(1) and 16(b)(2), the parties jointly move for a stay of all deadlines and proceedings in this case pending the Court’s ruling on the Defendants’ Unopposed Motion for Entry of Final Judgment (the “Motion”) (Doc. No. 68). “The District Court has broad discretion to stay proceedings as an incident to its power to control its own docket.” *Cannon v. Aetna Life Ins. Co.*, No. 14-CV-12546, 2015 WL 3766923, at *5 (D. Mass. June 17, 2015) (quoting *Clinton v. Jones*, 520 U.S. 681, 706 (1997)). Good cause exists for this request.

Defendants' response to the complaint currently is due July 1, 2025. Doc. No. 64. That deadline, and any other deadlines and further proceedings in this litigation, would be obviated by the relief requested in the Consent Motion.

No party will be prejudiced by the relief requested in this motion, and it will conserve the parties' and the Court's resources.

For the foregoing reasons, the parties respectfully ask the Court to grant this Joint Motion.

Respectfully submitted:

PLAINTIFFS,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: June 27, 2025

/s/ Nicole M. O'Connor
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